

Mark C. Zauderer, Esq.
Jonathan D. Lupkin, Esq.
Jason T. Cohen, Esq.
FLEMMING ZULACK WILLIAMSON ZAUDERER LLP
One Liberty Plaza, 35th Floor
New York, NY 10006
Tel: (212) 412-9500
Fax: (212) 964-9200
Email: jlupkin@fzwz.com
Email: jcohen@fzwz.com

Attorneys for Plaintiff Ashot Egiazaryan

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
ASHOT EGIAZARYAN,	:	
	:	11 CV 02670 (PKC) (GWG)
Plaintiff,	:	
	:	ECF
-against-	:	
	:	DECLARATION OF
PETER ZALMAYEV,	:	<u>JONATHAN D. LUPKIN</u>
	:	
Defendant.	:	
-----X	:	

JONATHAN D. LUPKIN, hereby declares, under penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

1. I am a member of the law firm Flemming Zulack Williamson Zauderer LLP, counsel for Plaintiff Ashot Egiazaryan in the above-captioned action. I submit this declaration in further support of Plaintiff's Motion for a Protective Order.
2. Annexed as Exhibit 15 is a true and correct copy of relevant excerpts from the Transcript of the Deposition of Douglas Bloomfield, former legislative director of AIPAC and paid consultant to Mr. Zalmayev in furtherance of the anti-Egiazaryan smear campaign, taken on November 11, 2011.

3. Annexed as Exhibit 16 is a true and correct copy of relevant excerpts from Peter Zalmayev's Memorandum of Law in Opposition to Ashot Egiazaryan's Motion to Dismiss the Counterclaims Pursuant to Federal Rule 12(b)(6) and to Strike Portions of the Counterclaims Pursuant to Federal Rule 12(f), dated September 15, 2011.

4. Annexed as Exhibit 17 is a true and correct copy of a private investigator's report produced by the defendant, which concerns the homes where Mr. Egiazaryan and his family resides, the vehicles they own and the people who drive them, Bates stamped PZ 001099-001100.

5. Annexed as Exhibit 18 are true and correct copies of surveillance photographs of Mr. Egiazaryan produced by defendant, Bates stamped PZ 001103-001104.

6. Annexed as Exhibit 19 is a true and correct copy of a statement by Andrey Gloriozov, an alleged former trustee of Mr. Egiazaryan in Luxembourg, concerning a bank transfer made 13 years ago. The statement was produced by defendant and bears Bates number PZ 001084.

7. Annexed as Exhibit 20 is a true and correct copy of a letter produced by defendant and addressed to an individual who we believe to be a journalist at the LA Times. The letter claims that the unidentified author of the letter possesses information about Mr. Egiazaryan's alleged sexual preferences and behavior. It is Bates stamped PZ 001302.

8. Annexed as Exhibit 21 is a true and correct copy of an e-mail from Douglas Bloomfield to Peter Zalmayev, dated March 21, 2011, Bates stamped BA 00108.

I declare under penalty of perjury that the foregoing is true and correct.
Executed in New York, New York on November 30, 2011.



JONATHAN D. LUPKIN